

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

CHRISTIN NYABATE NYANDEMO,

Defendant.

Case No. 1:25-MJ-82

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Brian Keys, being duly sworn state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am an Enforcement Officer for United States Customs and Border Protection (CBP). I have been employed with CBP, formerly known as the United States Immigration and Naturalization Service (INS), for over 21 years. During this time, I have received specialized training relating to administrative and criminal violations of the Immigration and Nationality Act and Titles 8 and 18 of the United States Code, and I am experienced in the detection of counterfeit and altered documents.

2. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during this investigation, as well as the observations of other law enforcement officers involved in this investigation. This affidavit contains information necessary to support probable cause and is not intended to include every fact and matter observed by me or known to the United States.

3. I submit this affidavit in support of a criminal complaint charging Christin Nyabate NYANDEMO with misuse of a passport, in violation of 18 U.S.C. § 1544. For the reasons set forth herein, I submit that there is probable cause to believe that on or about February 21, 2025, in the

Eastern District of Virginia, NYANDEMO willfully and knowingly used, or attempted to use, a passport issued or designed for the use of another.

SUMMARY OF PROBABLE CAUSE

4. On or about February 21, 2025, NYANDEMO arrived at Washington Dulles International Airport (Dulles), within the Eastern District of Virginia, aboard United Airlines flight 997 from Accra, Ghana.

5. Upon arrival, NYANDEMO presented the primary CBP Officer a valid Kenyan passport with a number ending in 697 and an expired Kenyan passport with a number ending in 276. The passport ending in 276 contained a United States B1/B2 tourist visa with a foil number ending in 323. The documents all bore the name of an individual (hereinafter, "VICTIM 1"), who has the same last name as NYANDEMO but a different first and middle name. The date of birth listed on the documents was xx/xx/1989.

6. During the primary inspection of NYANDEMO, the CBP primary officer captured her biometrics (fingerprints). The officer also conducted a brief interview of NYANDEMO to determine the purpose of her visit to the United States. The officer referred NYANDEMO for secondary inspection to verify her stated plans for her visit to the U.S.

7. In the secondary inspection area, NYANDEMO was interviewed by secondary CBP Officers to determine her admissibility to the United States. CBP officers also conducted a border search of NYANDEMO's baggage. During the baggage search, officers found a Kenyan birth certificate, Kenyan identification card, Canadian marriage certificate, and various bank cards which all apparently belonged to VICTIM 1.

8. A review of records in a CBP database revealed that VICTIM 1 had previously traveled to the U.S., at which time her biometrics had been captured by CBP. A comparison of

VICTIM 1's biometrics (fingerprints) captured during her previous visit and NYANDEMO's biometrics (fingerprints) captured at Dulles on February 21, 2025, revealed that the biometrics did not match.

9. CBP officers interviewed NYANDEMO, who admitted that all of the identification documents in her possession, including the passport that she presented to the primary CBP officer, actually belonged to her sister, VICTIM 1. I responded to the secondary inspection area to investigate further.

10. At the secondary inspection area, I read NYANDEMO her Miranda rights in her native language of English and she agreed to speak with me. During the interview, NYANDEMO admitted that the passports and visa that she presented to the CBP officers actually belonged to her sister, VICTIM 1. NYANDEMO stated her real name was Christin Nyabate NYANDEMO and that her date of birth was xx/xx/1991. NYANDEMO admitted that she took VICTIM 1's documents without her knowledge, and that she traveled by bus from Kenya to Tanzania and boarded a flight to Accra, Ghana. NYANDEMO stated that she traveled to Tanzania because she did not want to be detected by Kenyan authorities.

CONCLUSION

11. Based on the foregoing, I submit there is probable cause to believe that on or about February 21, 2025, within the Eastern District of Virginia, Christin Nyabate NYANDEMO willfully and knowingly used or attempted to use a passport issued or designed for the use of another, in violation of 18 U.S.C. § 1544.

Respectfully submitted,

Brian Keys

Brian Keys, Enforcement Officer
U.S. Customs and Border Protection

Sworn and subscribed to in accordance with Fed. R. Crim. P. 4.1 by telephone on February 22, 2025:



Digitally signed by Ivan Davis
Date: 2025.02.22 14:14:24
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The Honorable Ivan D. Davis
United States Magistrate Judge
Alexandria, Virginia